

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Case No. 23-cv-\_\_\_\_ (\_\_\_\_/\_\_\_\_)

UNITED STATES OF AMERICA,

Plaintiff,

v.

\$7,049 IN U.S. CURRENCY,

Defendant.

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**VERIFIED COMPLAINT FOR FORFEITURE *IN REM***

The plaintiff, United States of America, through its attorneys Andrew M. Luger, United States Attorney for the District of Minnesota, and Lucas B. Draisey, Assistant United States Attorney, in a civil cause of action for forfeiture, alleges as follows in accordance with Supplemental Rule G(2) of the Federal Rules of Civil Procedure:

**NATURE OF THE ACTION**

1. This is an action to forfeit and condemn to the use and benefit of the United States of America \$7,049 in U.S. Currency for violations of 21 U.S.C. § 841 *et. seq.*

**THE DEFENDANT *IN REM***

2. The defendant *in rem* is \$7,049 in U.S. Currency (“the Defendant Property”) seized from Keonee Nasir Shaffer-Frazier on September 28, 2022. The Defendant Property is in the custody of the United States Marshals Service.

### **JURISDICTION AND VENUE**

3. Plaintiff brings this action *in rem* to forfeit and condemn the Defendant Property. This Court has jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345 and over an action for forfeiture under 28 U.S.C. § 1355(a).

4. This Court has *in rem* jurisdiction over the Defendant Property under 28 U.S.C. § 1355(b). Upon the filing of this Complaint, the Plaintiff requests that the Clerk of Court issue an arrest warrant *in rem* pursuant to Supplemental Rule G(3)(b)(i), which the Plaintiff will execute upon the Defendant Property pursuant to 28 U.S.C. § 1355(d) and Supplemental Rule G(3)(c).

5. Venue is proper in the District of Minnesota pursuant to 28 U.S.C. § 1355(b)(1) because acts or omissions giving rise to the forfeiture occurred in this District, and pursuant to 28 U.S.C. § 1395 because the Defendant Property is located in this District.

### **FACTS**

6. Beginning in or around 2021, investigators with the federal Drug Enforcement Administration, the Southwest Hennepin County Drug Task Force, the Dakota County Drug Task Force, and other agencies launched a joint investigation into a drug trafficking organization known as The Bartel, which had been illegally distributing controlled substances in and around the Twin Cities Metropolitan Area.

7. A Confidential Source began speaking to investigators about The Bartel's drug trafficking operations in or around February 2022, identifying participants in the operation. The CS gave investigators detailed information, identifying Keonee Nasir

Shaffer-Frazier and others as a leader and participant in the group's drug trafficking operations.

8. As investigation continued, investigators identified Shaffer-Frazier's apartment and vehicle in the Uptown Minneapolis neighborhood. Investigators obtained a search warrant and searched Shaffer-Frazier's apartment and vehicle in March 2022.

9. In Shaffer-Frazier's apartment, investigators found approximately 1,200 blue counterfeit oxycodone pills containing fentanyl (known as "M-Box" pills), over \$16,000 in U.S. Currency, a black plate carrier vest, 9-millimeter rounds, multiple high-capacity magazines, and three boxes of ammunition. And in Shaffer-Frazier's vehicle, investigators recovered a loaded Glock Model 42 in the driver's-side door.

10. Additional investigation revealed that Shaffer-Frazier supplied fentanyl M-Box pills to his suppliers by the thousands.

11. In July 2022, the United States Attorneys' Office for the District of Minnesota indicted five members of drug trafficking organization, including Shaffer-Frazier. *United States v. Keonee Nasir Shaffer-Frazier*, Case No. 22-cr-141 (MJD/JFD), ECF No. 1. The Court issued an arrest warrant for Shaffer-Frazier that same day. *Id.*, ECF No. 5.

12. On September 28, 2022, members of the U.S. Marshals Service Fugitive Task Force and the Ramsey County Fugitive Task Force located a vehicle used by Shaffer-Frazier at an apartment complex located at 6221 Shingle Creek Parkway, Minneapolis, Minnesota.

13. Law enforcement officers saw Shaffer-Frazier walking towards the vehicle and approached. Shaffer-Frazier fled on foot, but investigators apprehended him in a parking lot at the Brookdale Center Mall after a short chase.

14. Officers searched Shaffer-Frazier incident to the arrest and found \$7,049 in U.S. Currency, the Defendant Currency, on his person and seized a loaded Glock handgun from Shaffer-Frazier's vehicle.

15. On February 1, 2023, Shaffer-Frazier pled guilty to one count of Conspiracy to Distribute Fentanyl, in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(A), and 846. *United States v. Keonee Nasir Shaffer-Frazier*, Case No. 22-cr-141 (MJD/JFD), ECF No. 170.

16. As part of his plea agreement, Shaffer-Frazier admitted, from as early as April 2021 through July 2022, he was a part of a conspiracy to distribute fentanyl. *Id.* at 3.

17. Shaffer-Frazier admitted that he and his co-conspirators obtained counterfeit blue oxycodone pills containing fentanyl from sources outside of Minnesota, arranged for those fentanyl pills to be transported and delivered to Minnesota, and distributed those pills to customers in and around the Twin Cities. *Id.*

18. Shaffer-Frazier further admitted that he maintained a customer base to which he regularly distributed blue fentanyl pills by the hundreds or thousands, collected money (mostly cash) for his and other co-conspirators' drug sales, organized deliveries, and facilitated conspiracy communications. *Id.*

19. Shaffer-Frazier had no legitimate source of income when he was arrested. His only significant source of cash is proceeds from dealing fentanyl and related drug trafficking operations.

20. Like the U.S. Currency forfeited as part of the criminal prosecution, the Defendant Currency was furnished or intended to be furnished in exchange for a controlled substance, constitutes proceeds traceable to such an exchange, or was used or intended to be used to facilitate a violation of the Controlled Substances Act.

### **BASIS FOR FORFEITURE**

21. The allegations in the preceding paragraphs are realleged and incorporated by reference.

22. The defendant \$7,049 in U.S. Currency is subject to forfeiture pursuant to 21 U.S.C. § 881(a)(6) because it was furnished or intended to be furnished in exchange for a controlled substance, constitutes proceeds traceable to such an exchange, or was used or intended to be used to facilitate a violation of the Controlled Substances Act.

### **CLAIM FOR RELIEF**

23. The plaintiff requests that the Court issue a warrant for the arrest and seizure of the Defendant *in rem*, that notice of this action be given to all persons who reasonably appear to be potential claimants of interests in the Defendant *in rem*, that the Defendant *in rem* be forfeited and condemned to the United States of America, that the plaintiff be awarded its costs and disbursements in this action, and for such other and further relief as this Court deems proper and just.

Dated: March 16, 2023

Respectfully submitted,  
ANDREW M. LUGER  
United States Attorney

*/s/ Lucas B. Draisey*

BY: LUCAS B. DRAISEY  
Assistant United States Attorney  
Attorney ID Number 0401625  
600 U.S. Courthouse  
300 South Fourth Street  
Minneapolis, MN 55415  
(612) 664-5600  
lucas.draisey@usdoj.gov

### VERIFICATION

I, Ryan J. Westby, verify and declare under penalty of perjury as follows:

I am and have been a Task Force Officer for the Drug Enforcement Administration (“DEA”) since September of 2019. I have read the foregoing Verified Complaint *In Rem* and know the contents thereof, and the matters contained in the Verified Complaint are true to my own knowledge, except that those matters not within my knowledge are alleged on information and belief, and I believe those matters to be true.

The sources of my knowledge and information and the grounds of my belief are the official files and records of the United States, information provided to me by other law enforcement agencies and officers, and information I have learned by reviewing reports prepared by other law enforcement agencies and officers, as well as my investigation of this case, together with others, as a DEA Task Force Officer.

I hereby verify and declare under penalty of perjury that the foregoing is true and correct.

Dated: March 13, 2023

s/ Ryan J. Westby  
RYAN J. WESTBY  
Task Force Officer  
U.S. Drug Enforcement  
Administration